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**MEMO ENDORSED**, last page.

June 12, 2023

**BY ECF**

Hon. Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

*Re: United States v. Neil Cole*, 19 Cr. 869 (ER)

Dear Judge Ramos:

We represent Neil Cole in the above-captioned matter. We write to respectfully request an adjournment of sentencing, currently scheduled for July 25, 2023, to a date in the first week of October. Mr. Cole respectfully seeks an extension for two reasons.

[REDACTED]

Second, the parties continue to meet and confer in an effort to come to an agreement on the loss amount calculation. The adjournment would provide the parties additional time to reach an agreement in advance of sentencing.

For these same reasons, we respectfully request that the Court also extend Probation's deadlines for submitting a first and second draft of the presentence report, currently due June 15 and July 11, respectfully.

The government consents to this request. This is the second request for adjournment of the sentencing date.

KAPLAN HECKER & FINK LLP

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The parties are available to answer any questions the Court may have.

Respectfully submitted,



Sean Hecker

Sentencing is adjourned to October 5, 2023 at 3:30 p.m.  
SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 6/16/2023

New York, New York